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Tradeline Enterprises Pvt. Ltd.*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

## TRADELINE ENTERPRISES PVT. LTD.,

CASE NO.: 2:15-CV-08048 - JAK  
(RAOx)

Plaintiff,

V.

JESS SMITH & SONS COTTON,  
LLC; and J.G. BOSWELL  
COMPANY,

## Defendants.

**DECLARATION OF MARK JACOBS  
IN SUPPORT OF PLAINTIFF  
TRADELINE ENTERPRISES PVT.  
LTD'S OPPOSITION TO MOTION  
TO ADD ADDITIONAL JUDGMENT  
DEBTORS**

Date: April 1, 2019  
Time: 8:30 a.m.  
Ctrm: 10B  
Judge: John A. Kronstadt

## DECLARATION OF MARK JACOBS

I, MARK JACOBS, declare as follows:

1. I have been a member of the State Bar of New York since April 11, 1983 and the State Bar of Connecticut since May 19, 1997, and I am in good standing with both Bars. For almost a decade, I have specialized in providing litigation and dispute funding in commercial matters.

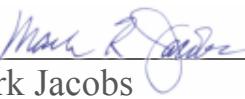
2. I understand that a motion has been filed in these proceedings to add the entity Arrowhead Capital, LLC as a judgment debtor to the ICDR arbitration award in case No. 01-16-003-8669 and corresponding judgment before this Court.

3. Arrowhead Capital, LLC is a Delaware limited liability company that I formed with several other partners in 1998. It is defunct. It has not engaged in any trade or business for at least several years, and accordingly it has not made the necessary filings to operate as a Delaware limited liability company in good standing.

4. Moreover, Arrowhead Capital, LLC does not have any connection with my present litigation funding. It has never done business in the states of California or Arizona. It has no connection whatsoever to this litigation, ICDR arbitration case No. 01-16-003-8669, or Tradeline Enterprises Pvt Ltd. It is not engaged in litigation funding of any kind, regarding this matter or otherwise.

5. Arrowhead Capital, LLC disputes that it is subject to personal jurisdiction in this Court, as set forth in the accompanying Opposition. To the extent this declaration and the accompanying Opposition are deemed an appearance by Arrowhead Capital, LLC, it reserves – and does not waive – all rights to object to the exercise of personal jurisdiction over Arrowhead Capital, LLC.

1 I declare under penalty of perjury that the foregoing is true and correct and  
2 that this declaration was executed at Westport, Connecticut, this 7<sup>th</sup> day of February  
3 2019.

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6 Mark Jacobs  
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